

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JEFFERY A. STALLWORTH

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16cv246-CWR-FKB

GOVERNOR DEWEY PHILLIP
"PHIL" BRYANT, ET AL.

DEFENDANTS

and

TONY T. YARBER, Mayor of the City of
Jackson, Mississippi, on behalf of the
Citizens of the City of Jackson, ET AL.

INTERVENOR-PLAINTIFFS

VS.

PHIL BRYANT, in his Official Capacity as
Governor of the State of Mississippi, ET AL.

DEFENDANTS

GOVERNOR PHIL BRYANT'S RULE 26(a)(1) INITIAL DISCLOSURE

Defendant Phil Bryant, in his official capacity as Governor of the State of Mississippi ("defendant"), without waiving any applicable evidentiary or testimonial privileges or immunities, including but not limited to his legislative and/or other related immunities which may be applicable to any testimony or discovery sought from him in this action, submits the following initial disclosure pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26(a)(1):

1. **Individuals with Information Potentially Within the Scope of Rule 26(b)(1).**

The Named Plaintiffs

c/o Counsel for Plaintiffs

Potentially Discoverable Knowledge: Bases for factual allegations in Plaintiffs' Complaint [Dkt. 42], and claims and defenses of the parties

EXHIBIT

1

Any individuals identified in documents produced, or otherwise identified in discovery in this action

Defendant reserves his right to supplement these disclosures, and to invoke, and by making these disclosures does not waive, any applicable evidentiary or testimonial privileges or immunities, including but not limited to, his legislative and/or other related immunities which may be applicable to any testimony or discovery sought from him in this action.

2. Documents Supporting Claims and Defenses.

The exhibits affixed to Plaintiffs' Complaint [Dkt. 42]

The documents referenced in Plaintiffs' Complaint [Dkt. 42]

The documents affixed hereto and Bates labeled "DEF 000001 - DEF 000150"

The on-line data compiled by the Mississippi College School of Law's Legislative History Project for 2016 S.B. 2162, available on-line at: http://law.mc.edu/legislature/bill_details.php?id=5088&session=2016 (last accessed Dec. 2, 2016)

All documents which have or will be produced in response to discovery requests served by Plaintiffs in this lawsuit

All documents which have or will be produced by Plaintiffs in this lawsuit

Defendant reserves his right to supplement these disclosures, and to invoke, and by making these disclosures does not waive, any applicable evidentiary or testimonial privileges or immunities, including but not limited to, his legislative and/or other related immunities which may be applicable to any testimony or discovery sought from him in this action.

3. Claims for Damages.

Defendant does not assert any claim for damages, however, defendant reserves his right to seek costs as well as any attorney fees and expenses which may prove to be appropriate under the federal rules, 28 U.S.C. § 1927, 28 U.S.C. § 1988, or any other applicable rule or statute, upon final resolution of this action.

4. Insurance Agreements.

Plaintiffs' lawsuit does not implicate any insurance agreement described in Rule 26(a)(1)(A)(iv).


THIS the 22nd day of December, 2016.

Respectfully submitted,

GOVERNOR PHIL BRYANT

By: JIM HOOD, ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served on the following counsel of record via US Mail, properly addressed and postage prepaid:

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THIS the 22nd day of December, 2016.


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